

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

|                                      |   |                                   |
|--------------------------------------|---|-----------------------------------|
| TYLER FERRIS,                        | ) |                                   |
| on behalf of Plaintiff and the class | ) |                                   |
| members described herein,            | ) |                                   |
|                                      | ) |                                   |
| Plaintiff,                           | ) | Case No.: 1:23-cv-02017-SEB-MJD   |
|                                      | ) |                                   |
| v.                                   | ) | Judge Sarah Evans Barker          |
|                                      | ) | Magistrate Judge Mark J. Dinsmore |
| BIBOON, LLC doing business as        | ) |                                   |
| Bridge Lending Solutions;            | ) |                                   |
| LDF HOLDINGS, LLC;                   | ) |                                   |
| BRITTANY ALLEN;                      | ) |                                   |
| DANIEL KOETTING;                     | ) |                                   |
| ROCKHILL CONSULTING                  | ) |                                   |
| GROUP, LLC;                          | ) |                                   |
| and JOHN DOES 1-20,                  | ) |                                   |
|                                      | ) |                                   |
| Defendants.                          | ) |                                   |

**NOTICE OF SETTLEMENT & REQUEST TO STAY DEADLINES**

Plaintiff Tyler Ferris (“Plaintiff”) submits this notice to inform the Court that the parties have settled this matter in principle and expect to file dismissal papers within the next sixty days. Plaintiff respectfully requests that all deadlines be stayed while the parties negotiate a written settlement agreement.

Respectfully submitted,

/s/Matthew J. Goldstein  
Matthew J. Goldstein

Daniel A. Edelman  
Heather Kolbus  
Matthew J. Goldstein  
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**CERTIFICATE OF SERVICE**

I, Matthew J. Goldstein, certify that on Wednesday, January 17, 2024, I caused a true and accurate copy of the foregoing document to be filed via the court's CM/ECF online system, which sent notice via email to counsel of record. I further certify that I sent the foregoing document to the following:

Patrick McAndrews  
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*Counsel for Biboon, LLC and  
LDF Holdings, LLC*

/s/Matthew J. Goldstein  
Matthew J. Goldstein

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